

EXHIBIT D

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
TRI-STATE PAPER, INC.	:	Chapter 11
Debtor	:	Case No. 23-13237-pmm
	:	
	:	

**AFFIDAVIT OF JOSHUA B. LADOV, ESQUIRE IN
SUPPORT OF PENN JERSEY PAPER CO.'S
MOTION TO HAVE PROOF OF CLAIM FILED OUT OF TIME
DEEMED TIMELY FILED PURSUANT TO F.R.B.P. 9006(b)(1)**

I, Joshua B. Ladov, Esquire, am counsel for Movant, Penn Jersey Paper Co. and make this Affidavit in support of Penn Jersey Paper Co.'s Motion to File Proof of Claim Out of Time Pursuant to F.R.B.P. 9006(b)(1) as follows:

1. My Client, Penn Jersey Paper Co. emailed me on 11/21/23 about a new matter, Tri-State Paper, Inc.
2. Included in the email was the Court's Order Setting Last Day to File Proofs of Claim.
3. I forgot about the 11/21/23 email until my client again emailed me on 2/8/24 transmitting the Court's 1/31/24 Order entered at No. 156 on the docket, the entry of which reads: "Order: It is hereby Ordered that the following dates and deadlines will govern the procedure of this case. The Court shall hold a hearing on confirmation of the Debtor's plan of reorganization on Wednesday, March 13, 2024, at 9:30 a.m. in the United States Bankruptcy Court, Robert N.C. Nix, Sr. Federal Courthouse, Courtroom 1, 900 Market St., Philadelphia, Pennsylvania, 19107. re:145 (S., Antoinette) (Entered: 01/31/2024)."
4. On 2/8/24, I entered my appearance and filed Penn Jersey's Proof of Claim.
5. The late filing of the Proof of Claim was due to my neglect, and my client had no reason to know that I was not properly representing its interests.

I make the declaration under penalty of perjury.


JOSHUA B. LADOV, ESQUIRE